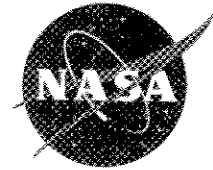


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



September 24, 2008

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the Google Lunar X PRIZE Reception Sept. 30, 2008, in conjunction with the International Astronautical Congress, Glasgow, Scotland

On September 30, 2008, the X PRIZE Foundation will host a reception at the International Astronautical Congress (IAC) in Glasgow, Scotland. The reception is open to all IAC attendees. This event will therefore be a widely attended gathering of at least 200 persons, including civil servants from NASA, representatives of international space agencies, Google Lunar X PRIZE teams and other parties interested in lunar exploration missions, and academic and personal spaceflight industry leaders. The approximate value of this event is \$20 per person. The purpose of the event is to foster open discussion about lunar exploration missions and the Google Lunar X PRIZE among industry, government leaders and other interested parties. The X PRIZE Foundation is a I.R.C. section 501(c)3 educational nonprofit prize institution, with the mission of creating radical scientific or technical breakthroughs for the benefit of humanity.

I find this event meets the requirements of a widely attended gathering as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event. Additionally, the estimated value of the reception is minimal at \$20 per person. This event will have direct application to NASA's space exploration goals as well as the personal spaceflight industry. Accordingly, NASA employees whose duties do not substantially affect the X PRIZE Foundation may accept an invitation for themselves for free attendance at the reception.

NASA employees whose duties may substantially affect the X PRIZE Foundation, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone